

DECLARATION OF RYAN MILES

I, Ryan Miles, do hereby declare:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the United States Department of Homeland Security, Homeland Security Investigations (HSI), where I have been since September 2017. Prior to becoming a SA with HSI, I worked for 8 years as a Federal Air Marshal. As a SA with HSI, I have received training from the Federal Law Enforcement Training Center (FLETC) in Glynco, GA, graduating from the Criminal Investigator Training Program (CITP) and the Homeland Security Investigations Special Agent Training Program (HSISAT). I am a law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and I am authorized by law to conduct investigations and to make arrests for felony offenses.

PURPOSE OF THIS DECLARATION

2. This declaration is submitted in support of a Complaint *in rem* for forfeiture of the real property located at 17300 Ramsey Road, White City, Oregon, (hereinafter “**Defendant Real Property**”); 2020 Ford F-350 pickup truck, VIN 1FT8W3BT9LEC21971, with its tools and appurtenances, (hereinafter “**Defendant Truck**”); Snake River Utility Trailer, VIN 5PTBD1426M1040008, (hereinafter “**Defendant Trailer**”); \$6,661.00 U.S. currency (hereinafter “**Defendant Currency 1**”); and \$56,287.96 U.S. Currency, (hereinafter **Defendant Currency 2**”).

Defendant Real Property is further described as:

TRACT A: A tract of land located in the northwest quarter of Section 29, in Township 34 South, Range 2 West of the Willamette Meridian, Jackson County, Oregon.

TRACT B: A tract of land located in the northwest quarter of Seciton29, Township 34 South, Range 2 West, of the Willamette Meridian, Jackson County, Oregon.

Tax Accounts # 10580871 and 10730747

3. In this declaration, I will demonstrate that there is probable cause that **Defendant Real Property, Defendant Truck, Defendant Trailer, Defendant Currency 1, and Defendant Currency 2** described above constitute property that was used or intended to be used to facilitate the illegal production, conversion, and/or distribution of marijuana, or represents proceeds traceable to an exchange for controlled substances or was intended to be used as such, in violation of 21 U.S.C. § 841 and therefore **Defendant Real Property** is subject to forfeiture pursuant to the provisions of 21 U.S.C. § 881(a)(7), **Defendant Truck** and **Defendant Trailer** are subject to forfeiture pursuant to the provisions of 21 U.S.C. § 881(a)(4), and **Defendant Currency 1** and **Defendant Currency 2** are subject to forfeiture pursuant to the provisions of 21 U.S.C. § 881(a)(6).

4. The facts in this declaration come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This declaration is for the limited purpose of establishing probable cause for the Complaint. Therefore, I have not set forth each fact I have learned during this investigation, but only those facts and circumstances necessary to establish probable cause.

SUMMARY OF INVESTIGATION

5. On Thursday, May 18, 2023, an Illegal Marijuana Enforcement Team (IMET) Detective conducted a flyover in a helicopter in the area of Ramsey Road and observed a grow operation occurring at 17300 Ramsey Road, White City, Jackson County, Oregon (**Defendant Real Property**), with greenhouses and planter boxes being prepped for the grow season. An IMET Analyst conducted a law enforcement check for licensing at the **Defendant Real Property** through the Oregon Liquor and Cannabis Commission (OLCC), the Oregon Medical Marijuana

Program (OMMP), and the Oregon Department of Agriculture (ODA). The Analyst determined there was no license. No further investigation was done at this time.

6. On Tuesday, August 28, 2023, IMET Detectives conducted another flyover of the **Defendant Real Property**. Detectives noticed a very large area of what appeared to be marijuana plants being grown outside of the greenhouses. An IMET Analyst conducted another law enforcement check for licensing at the **Defendant Real Property**, through OLCC, OMMP, and ODA and confirmed it was still an unlicensed location. The **Defendant Real Property** was found to be owned by Valentin DASKALOV and was listed as approximately 15.36 acres, per the Jackson County Oregon Interactive Mapping system.

7. During this time, a confidential and reliable source (CRI) had also relayed to IMET Detectives that an individual, Emanuil Tzvetanov (EMANUIL), was in town from Florida conducting marijuana business with his stepfather, later identified as DASKALOV, and with Nikolay G. Kouspov (NIKOLAY) out of Cave Junction, Oregon. The CRI provided detectives information about a large marijuana drug trafficking organization in which NIKOLAY and DASKALOV were cultivating marijuana at several locations in Jackson and Josephine County, which EMANUIL assisted by moving the marijuana to the east coast for distribution. While EMANUIL was in town conducting marijuana business, the CRI said EMANUIL drove and used DASKALOV's white truck, later identified as the **Defendant Truck**, further described as a 2020 Ford F-350 pickup with VIN# 1FT8W3BT9LEC21971, registered and owned by Valentin DASKALOV, seized from 17300 Ramsey Road in White City, Oregon during the execution of a warrant on September 21, 2023.

8. During a law enforcement check for the registration of the **Defendant Truck**, EMANUIL was identified by IMET Detectives from body camera footage that had been taken during an

earlier traffic stop for a cell phone violation. With the information obtained from the CRI and the subsequent confirmation from law enforcement checks by IMET Detectives, confirming the CRI information, IMET Detectives executed a warrant at NIKOLAY's Cave Junction property on September 19, 2023. During the execution of the warrant for several criminal violations including the unlawful manufacture and delivery of marijuana, detectives seized cash and over 400 illegal marijuana plants that were still growing and over 25 pounds of processed marijuana from NIKOLAY's Cave Junction property.

9. The evidence concluded that Valentin DASKALOV (DASKALOV) operates a drug trafficking organization (DTO) based in White City, Oregon, that produces marijuana in Oregon and transports it to states outside of Oregon, to include Florida, where DASKALOV also owns property. Based on this, IMET Detectives executed a state search warrant for the **Defendant Real Property** on September 21, 2023, for several criminal violations including the unlawful manufacture and delivery of marijuana.

Warrant at 17300 Ramsey Road in White City, Oregon (Defendant Real Property)

10. During the execution of the search warrant at the **Defendant Real Property**, investigators found that every building on the property was set up to assist with the growing, drying, and/or processing of marijuana. Investigators found that the residence, all of the barns, tents, sheds, and trailers were associated with the cultivation or processing of marijuana and in the majority of the processing areas, there were USPS shipping boxes. Additionally, one trailer on the property contained the components of a THC extraction lab that was not yet up and running.

11. During the execution of the search warrant, law enforcement seized and destroyed over 1,000 growing illegal marijuana plants (photographed below) that were ready for harvest after testing and taking multiple samples. Investigators on scene also seized and destroyed

approximately 10 pounds of processed marijuana after taking samples as evidence. IMET Detectives found that the marijuana grow operation was set up almost identically to NIKOLAY's Cave Junction operation that was raided just a few days before.



12. A semi quantitative test of plants growing at **Defendant Real Property** was conducted onsite with a Light Lab Cannabis Analyzer machine from Orange Photonics, which detected a THC-A percentage of 22.8%. A second presumptive test was also conducted on dried plant material seized onsite, which showed a THC-CBD ratio of 1:0, resulting in a high THC sample. This test result was consistent for a finding of marijuana as opposed to hemp.

13. During the execution of the search warrant, law enforcement found the **Defendant Truck**, previously seen during surveillance, and the **Defendant Trailer**, further described as a Snake River Utility Trailer with VIN# 5PTBD1426M1040008, registered and owned by Valentin DASKALOV.

14. Based on the amount of soil that had been transported to the location, the movement and spreading of this dirt, the transport of the marijuana to and from the location, and the fact that no animals or farming of any legal crops had been found on the 15 acres, detectives believed the

Defendant Truck and **Defendant Trailer** had been used to facilitate the marijuana grow.

Therefore, IMET Detectives requested that a K9 be deployed to the truck and the trailer. The K9 alerted on both the truck and the trailer to the presence of one of the five odors he has been trained to detect, one of those odors being marijuana. Officers then seized the **Defendant Truck** and **Defendant Trailer**.



15. During the initial execution of the warrant at the **Defendant Real Property**, investigators located Valentin DASKALOV exiting the residence on the property as they approached. Investigators also found another individual they identified as Devon DRUET sleeping in a separate trailer on the property. Both DASKALOV and DRUET were interviewed separately, and their statements were digitally recorded via a body worn camera.

Interview of DRUET

16. During a post Miranda interview with DRUET, he initially stated that he was on the **Defendant Real Property** for the past month and was just visiting, not working. DRUET claimed to know DASKALOV through DASKALOV's son, IGNATOV. DRUET later admitted to working on the marijuana grow for DASKALOV after investigators found checks issued from DASKALOV's Emerald Green Lawn Service to DRUET.

Interview of DASKALOV

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17. DASKALOV, during the initial service of the search warrant, thanked investigators for coming and told them that he wanted to be done growing marijuana. In a post Miranda interview with DASKALOV, he admitted that all of the plants that he was growing were marijuana, that he has been growing for the past three years, and that he was aware that he did not have permits to be growing marijuana. When asked, DASKALOV admitted to having some cash in a backpack in the bedroom of the residence. Investigators later located the backpack in the bedroom and seized \$6,661.00 in U.S. currency, **Defendant Currency 1**.

18. When asked about where all the marijuana he grew over the last three years went, DASKALOV stated that he did not want to know what happens to the weed, he just grew it. DASKALOV also claimed that although he invested in the marijuana grow, he did not make a profit from the marijuana and denied having any partners. DASKALOV did admit, however, to paying DRUET “like” \$1,500 per month to help on the marijuana grow, after being shown checks investigators found during the warrant, within the residence, that had been issued to DRUET from DASKALOV’s Emerald Green Lawn Service Chase bank account ending in #6031.

19. When asked about his Emerald Green Lawn Service, DASKALOV stated that he was not currently working and does not have any clients in Oregon. DASKALOV claimed that he sold his “accounts” and a truck for \$65,000 before coming to Oregon in 2021 to a guy named Bobbie. DASKALOV explained that Bobbie still deposited Emerald Green Lawn Service checks into DASKALOV’s Emerald Green bank account because Bobbie still owed him money from the purchase of the client accounts in Florida.

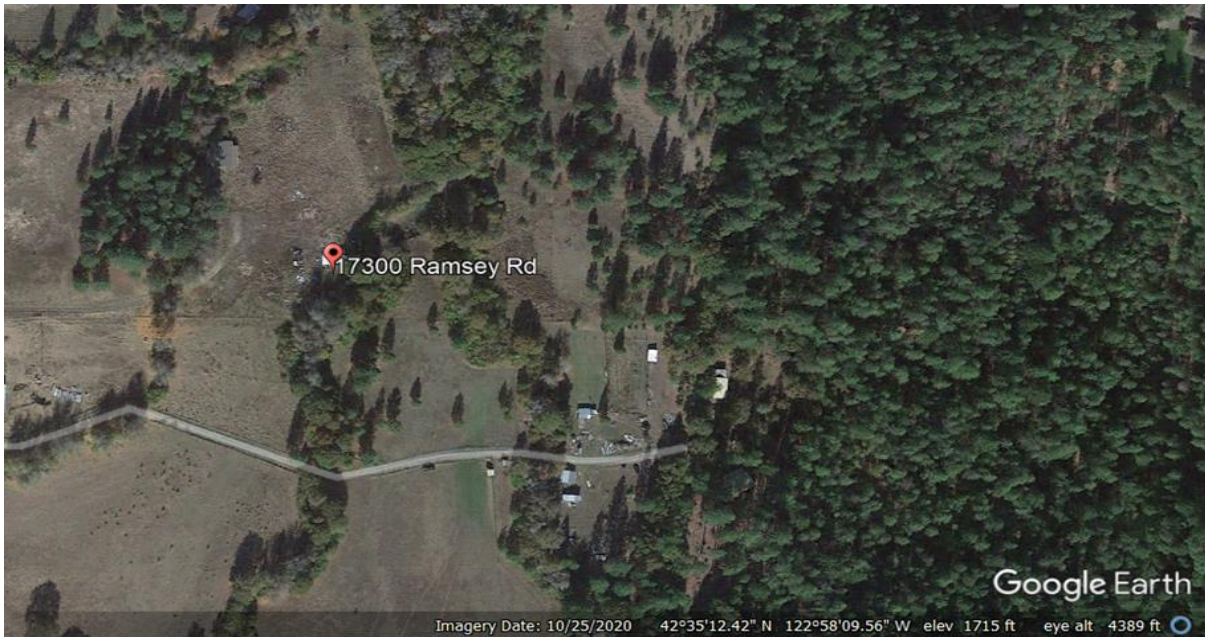
20. Following the warrant, investigators obtained additional bank records from the Emerald Green Lawn Service Chase account and found the following:

- A deposit for \$65,000 was made into the Emerald Green Lawn Service account on May 28, 2021. The deposit was consistent with the funds DASKALOV claimed to have obtained from the sale of his truck and landscaping accounts.
- After purchasing the **Defendant Real Property** and moving to Southern Oregon, DASKALOV made several payments to DRUET and two additional individuals, which appeared consistent with general labor payments.
- On August 16, 2021, after DASKAOV had moved to Oregon, the Small Business Administration (SBA) deposited \$103,800 in Economic Injury Disaster Loan funds into the Emerald Green business account. This deposit occurred approximately two and a half months after DASKALOV sold his landscaping accounts.

21. On or about November 28, 2023, investigators seized \$56,287.96 in U.S. Currency, **Defendant Currency 2**, from Valentin DASKALOV's Emerald Green Lawn Service, Inc. JP Morgan Chase Bank account ending in #6031.

Arial Photos of 17300 Ramsey Road in White City, Oregon (**Defendant Real Property**)

22. Jackson County records show DASKALOV purchased the **Defendant Real Property** in April of 2021 for \$325,000. Google Earth imagery dated October 25, 2020, shows that prior to DASKALOV's purchase of the **Defendant Real Property**, there were no greenhouses or planter boxes on the property, as shown below.



23. Bank records obtained by investigators from DASKALOV's Emerald Green Lawn Service, Inc. JP Morgan Chase bank account ending in #6031 showed that in August of 2021, a few months after the purchase of the **Defendant Real Property**, DASKALOV began making purchases at local stores with his ATM card, including WinCo Foods in Grants Pass, Oregon. Bank records also show that during this time, DASKALOV began issuing checks to two individuals, not previously paid before, and started regular monthly payments to John Deere Credit.

24. Jackson County records show that on February 24, 2022, DASKALOV applied for a permit for two 28'x160' green houses for **Defendant Real Property** and then on June 2, 2022, DASKALOV then applied to the county for the **Defendant Real Property** to be established as farm use. By October 4, 2022, Google Earth imagery shows two large hoop houses had been constructed on the **Defendant Real Property** along with the outlines of what appears to be a large

outdoor grow area near the hoop houses, confirming DASKALOV's statements that he had been growing for multiple years.



CONCLUSION

25. The evidence in this declaration provides probable cause to believe, and I do believe, that the **Defendant Real Property**, **Defendant Truck**, **Defendant Trailer**, **Defendant Currency 1**, and **Defendant Currency 2** were used or intended to be used to facilitate the illegal production, conversion, and/or distribution of marijuana, or represents proceeds traceable to an exchange for controlled substances or was intended to be used as such, in violation of 21 U.S.C. § 841 and therefore **Defendant Real Property** is subject to forfeiture pursuant to the provisions of 21 U.S.C. § 881(a)(7), **Defendant Truck** and **Defendant Trailer** are subject to forfeiture pursuant to the provisions of 21 U.S.C. § 881(a)(4), and **Defendant Currency 1** and **Defendant Currency 2** are subject to forfeiture pursuant to the provisions of 21 U.S.C. § 881(a)(6).

26. I have presented this declaration to Assistant United States Attorney Judith Harper who has advised me that in her opinion, the proposed complaint is supported by probable cause.

I declare under penalty of perjury that the forgoing is true and correct pursuant to 28 U.S.C. § 1746.

Executed this 2nd day of July 2024

s/ Ryan Miles
Ryan Miles
Special Agent
Homeland Security Investigations